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13 Defendant SHAKEY'S PIZZA ASIA
14 VENTURES, INC. and Third Party Defendants
15 CINCO CORPORATION, PC INTERNATIONAL
16 PTE LTD., and SPAVI INTERNATIONAL USA, INC.

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28 Attorneys for Defendants, Counterclaimants, and
Third Party Plaintiffs PCJV USA, LLC, PCI
TRADING LLC, POTATO CORNER, LA
GROUP, LLC, GK CAPITAL GROUP, LLC,
NKM CAPITAL GROUP, LLC and GUY
KOREN, and Defendants J & K AMERICANA,
LLC, J&K LAKEWOOD, LLC, J&K
OAKRIDGE, LLC, J&K VALLEY FAIR, LLC, J
& K ONTARIO, LLC, J&K PC TRUCKS, LLC,
HLK MILPITAS, LLC, and GK CERRITOS, LLC

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

SHAKY'S PIZZA ASIA VENTURES,
INC, a Philippines corporation,

Plaintiff,

vs.

PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING , LLC, a
Delaware limited liability company; GUY
KOREN, an individual; POTATO CORNER

Case No. 2:24-CV-04546-SB(AGRx)

Hon. Stanley Blumenfeld, Jr.

**THE PARTIES' JOINT
RESPONSE TO DKT. NO. 325**

Complaint Filed: May 31, 2024
Trial Date: TBD

1 LA GROUP, LLC, a California limited
liability company; NKM CAPITAL GROUP,
2 LLC, a California limited liability company;
J & K AMERICANA, LLC, a California
3 limited liability company; J&K
LAKEWOOD, LLC, a California limited
4 liability company; J&K VALLEY FAIR,
LLC, a California limited liability company;
5 J & K ONTARIO, LLC, a California limited
liability company; HLK MILPITAS, LLC, a
6 California, limited liability company; GK
CERRITOS, LLC, a California, limited
7 liability company; J&K PC TRUCKS, LLC,
a California limited liability company; and,
8 GK CAPITAL GROUP, LLC, a California
limited liability company and DOES 1
9 through 100, inclusive,

10 Defendants.

11 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
12 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
13 California limited liability company; GK
CAPITAL GROUP, LLC, a California
14 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
15 company; and GUY KOREN, an individual,

16 Counter-Claimants,

17 v.

18 SHAKEY'S PIZZA ASIA VENTURES,
19 INC, a Philippines corporation,

20 Counter Defendant.

21 PCJV USA, LLC, a Delaware limited
liability company; PCI TRADING LLC, a
22 Delaware limited liability company;
POTATO CORNER LA GROUP LLC, a
23 California limited liability company; GK
CAPITAL GROUP, LLC, a California
24 limited liability company; NKM CAPITAL
GROUP LLC, a California limited liability
25 company; and GUY KOREN, an individual,

26 Third Party Plaintiffs,

27 v.
28

1 PC INTERNATIONAL PTE LTD., a
2 Singapore business entity; SPAVI
3 INTERNATIONAL USA, INC., a California
4 corporation; CINCO CORPORATION, a
5 Philippines corporation; and ROES 1 through
6 10, inclusive,

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Third Party Defendants.

1 The parties submit this joint report in response to the Court's October 17,
2 2025 Order (the "Order" or "Dkt. 325").

3 **Compliance with the Court's Directives to Provide Orders to Judge Stone**

4 The parties certify that on Friday, October 17, Mr. Beral transmitted via email
5 to Judge Stone and his case manager a copy of Dkt. 325. On Monday, October 20,
6 Judge Stone's case manager confirmed receipt. If the Court so requests, Mr. Beral
7 will submit a declaration attesting to these facts.

8 For completeness of the record, Mr. Beral further reaffirms that, as each
9 issued, he transmitted to Judge Stone's case manager copies of the Court's prior
10 Orders appointing and expanding the Special Master's assignment, *see* Dkt. Nos.
11 214, 224, 239, and 252, and that Judge Stone's case manager contemporaneously
12 acknowledged receipt of those Orders at the time.

13 **Meet-and-Confer Regarding Potential Resolution or Narrowing**

14 On their initial call on October 10, Messrs. Shaeffer and Beral discussed
15 potential resolution of this action, including with their clients, and agreed to
16 continue those discussions. On a subsequent call on October 20, both sides
17 reaffirmed that settlement efforts should proceed in parallel; Defendants believe
18 settlement discussions should not delay summary judgment ruling or trial
19 scheduling. Both sides seek to efficiently resolve the intellectual property disputes.
20 Plaintiff's objective is to establish the scope of its asserted intellectual property
21 rights in the United States. Defendants have the same objective, including to resolve
22 the preliminary injunction and establish their asserted rights in the Potato Corner-
23 branded franchisor and franchisee businesses in the United States.

24 To balance efficiency with continued progress while avoiding unnecessary
25 expense, the parties will continue informal settlement discussions in parallel with
26 litigation. While exploring the potential for informal resolution of this matter and
27 ways to narrow the issues, Plaintiffs have expressed their belief that a facilitated
28 dialogue may be beneficial, and have discussed options with Defendants, including

1 a private mediation. The parties appreciate the Court's guidance and remain
2 committed to complying with all directives, engaging in good-faith discussions, and
3 proceeding expeditiously.

4 **Michael D. Murphy**

5 **Plaintiff:** The general counsel of Plaintiff's law firm (Fox Rothschild) has
6 authorized the firm to make the following statement to the Court: "Michael Murphy
7 went on a leave on October 7, 2025. We cannot provide any further information
8 because of applicable laws, including HIPPA."

9 **Defendants:** Defendants have requested clarification regarding the nature of
10 Mr. Murphy's leave of absence but have been informed that no additional
11 information will be provided, and that any statements disclosing the nature of the
12 leave must be approved by Plaintiff's law firm's general counsel.

1 DATED: October 21, 2025 **FOX ROTHSCHILD LLP**

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3 By: */s/ John Shaeffer*

4 John Shaeffer
5 Matthew Follett
6 Attorneys for Plaintiff and Counterclaim
7 Defendant SHAKEY'S PIZZA ASIA
8 VENTURES, INC. and Third Party
9 Defendants CINCO CORPORATION, PC
10 INTERNATIONAL PTE LTD., and SPAVI
11 INTERNATIONAL USA, INC.

12 DATED: October 21, 2025 **BLANK ROME LLP**

13
14 By: */s/ Arash Beral*

15 Todd M. Malynn
16 Arash Beral
17 Jamison T. Gilmore
18 Attorneys for Defendants, Counterclaimants,
19 and Third Party Plaintiffs PCJV USA, LLC,
20 PCI TRADING LLC, POTATO CORNER,
21 LA GROUP, LLC, GK CAPITAL GROUP,
22 LLC, NKM CAPITAL GROUP, LLC and
23 GUY KOREN, and Defendants J & K
24 AMERICANA, LLC, J&K LAKEWOOD,
25 LLC, J&K OAKRIDGE, LLC, J&K
26 VALLEY FAIR, LLC, J & K ONTARIO,
27 LLC, J&K PC TRUCKS, LLC, HLK
28 MILPITAS, LLC, and GK CERRITOS, LLC

CERTIFICATE OF SERVICE

The undersigned certifies that on October 21, 2025, the foregoing document was electronically filed with the Clerk of the Court for the United States District Court, Central District of California, using the Court's Electronic Case Filing (ECF) system. I further certify that all participants in the case are registered CM/ECF users and that service will be accomplished by the CM/ECF system.

I certify under penalty of perjury that the foregoing is true and correct.
Executed on October 21, 2025.

By: /s/AJ Cruickshank